

## **REMARKS**

By the above amendment, Applicant has: 1) amended claim 60; 2) added six new claims, claims 70-75; and 3) canceled no claims. As such, claims 53-55, 60-63, and 70-75 are now pending. Support for the amendment is found in the specification, the drawings, and in the claims as originally filed. Applicant submits that the amendment does not add new matter. Applicant respectfully requests reconsideration of the present application and consideration of the following remarks and the claims.

### **Declaration under 37 C.F.R. § 1.131**

In rejecting the pending claims 53-55 and 60-63, the examiner relied on a prior art reference, Davis et al., U.S. Patent Application Publication No. 2003/0155642. A signed declaration under 37 C.F.R. § 1.131 is filed along with this amendment. Applicant declares that the claimed invention was conceived and reduced to practice before the effective filing date of Davis et al. and therefore Davis et al. is not available as prior art under sections 102 or 103.

### **Claim Rejections - 35 U.S.C. § 102**

***“Claims 60-62 are rejected under 35 U.S.C. 102(e) as being anticipated by Davis et al. (US 2003/0155642).”***

The Office Action rejected claims 60-62 as being anticipated by Davis et al. Applicant respectfully disagrees. Applicant submits that the claimed invention was conceived and reduced to practice before the effective filing date of Davis et al. and therefore Davis et al. may not be relied upon for rejecting these pending claims. Furthermore, Applicant respectfully submits that

Davis et al. does not show each and every element of the present invention as claimed in claims 60-62.

For example, claim 60 reads:

60. A method of designing an integrated circuit (IC), the method comprising:  
generating a representation of at least one signal line;  
generating a representation of a shielding mesh having a first layer and a second layer,  
the first layer including a first conductor, the second layer including a second  
conductor, wherein the shielding mesh shields said at least one signal line which  
is routed through the shielding mesh; and  
generating a representation of two vias, each of the two vias connecting from the first  
conductor to the second conductor.

The Office Action stated that “Davis et al. discloses a method of designing an integrated circuit, the method comprising” each and every element of the claim 60. Applicant respectfully disagrees. As is clearly stated in Davis et al., and as will be evident to people of ordinary skill in the art, Davis et al. teaches a “reinforcement structure” that “may be fabricated *on the periphery* of the active device region or *within open regions* of the device that are susceptible to delamination and cracking” (Abstract, Davis et al.), and it is, in particular, completely silent on the claim limitation “shielding mesh”, which, among other things, “shields said at least one signal line *which is routed through the shielding mesh*” (for example, refer to FIGS. 8 and 9 of Application, which should be contrasted with figures 2 and 3 of Davis et al.). Therefore, Applicant respectfully submits that claim 60, and its dependent claims 61-62, are patentable over Davis et al.

**Claim Rejections - 35 U.S.C. § 103**

***“Claim 63 is rejected under 35 U.S.C. 103(a) as being unpatentable over Davis et al.”***

The Examiner rejected claim 63 as being unpatentable over Davis et al. Applicant respectfully disagrees. Applicant submits that claim 63 is patentable over Davis et al. at least for similar reasons given with respect to claims 60-62.

***“Claims 53-55 are rejected under 35 U.S.C. 103(a) as being unpatentable over Crafts (US 5,288,949) in view of Davis et al.”***

The Office Action rejected claims 53-55 as being unpatentable over Crafts in view of Davis et al. Applicant respectfully disagrees. First of all, Applicant submits that Davis et al. is not available as a prior art in view of the declaration filed by Applicant under 37 C.F.R. § 1.131, as stated earlier. Furthermore, Applicant respectfully submits that either reference, Crafts or Davis et al., or combination thereof, does not teach or suggest each and every element of the claimed invention, as claimed in claims 53-55.

For example, claim 53 recites:

53. A method of designing an integrated circuit (IC), said method comprising:  
creating a representation of a shielding mesh in at least one layer of said IC, said  
shielding mesh having a first plurality of lines which are designed to provide a  
first reference voltage and having a second plurality of lines which are designed  
to provide a second reference voltage; and

creating a representation of a plurality of signal lines routed through said shielding mesh, wherein at least one of said signal lines is coupled to a signal line on another layer through at least two vias.

The Office Action rejected claim 60 stating that “Crafts discloses a method of designing an integrated circuit ...”. Applicant respectfully disagrees. As will be clear to one of ordinary skill in the art, Crafts is concerned with “a multi chip module” which is “similar to a printed circuit board” (Abstract, Crafts), and it does not teach or suggest a method of designing integrated circuits. In particular, Crafts is completely silent on the claim limitation “a shielding mesh *in at least one layer of said IC*” or the claim limitation “a plurality of signal lines routed through said shielding mesh”, which is “coupled to a signal line on another layer through at least two vias”. Furthermore, there is no suggestion or justification, in either Crafts (which is concerned with multi chip module) or Davis et al. (which is concerned with reinforcement structure) or in any prior art references, that these two references can be combined in the manner proposed in the application. Therefore, Applicant respectfully submits that claim 53, and its dependent claims 54-55, are patentable over the prior art.

## CONCLUSION

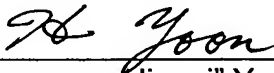
For all the above reasons, Applicant submits that the specification and claims are now in proper form, and that the claims all define patentably over the prior art. Therefore Applicant submits that all rejections have been overcome and that all pending claims are in condition for allowance, which action he respectfully solicits. If a telephone conference would facilitate the prosecution of this application, the Examiner is invited to contact Jimmi Yoon at (408) 720-8300, extension 305.

Authorization is hereby given to charge our Deposit Account No. 02-2666 for any charges that may be due or credit any overages. If an extension is required, Applicants hereby request such extension.

Respectfully Submitted,

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